

NOV 12 2012

NPDES Permit Tracking No.:

1DR05B6211



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: St Maries Complex

2. NPDES Permit Tracking No.: 1DR05B6211

3. Facility Physical Address:

a. Street: 2200 Railroad Ave

b. City: St Maries

c. State: ID

d. Zip Code: 83861

4. Lead Inspectors Name: Ward Cooper

Title: Environmental Mgr.

Additional Inspectors Name(s): Mike Fitzgerald

5. Contact Person: Ward Cooper

Title: Environmental Mgr.

Phone: 208 - 245 - 7503 Ext. E-mail: ward.cooper@potlatchcorp.com

6. Inspection Date: 09/22/2012

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?

☒ YES ☐ NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☒ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

TSS exceeded benchmarks in locations SMC001, SMC002, SMC 003, SMC 004.

COD levels exceeded benchmark in location SMC 001, SMC002, SMC 003, SMC 004.

Zinc levels exceeded benchmarks in location SMC002.

During inspection we tried to identify source of TSS and believe we can improve TSS levels through implementation of additional Control Measures and BMP's.

We were unable to identify any suspect agents that influence above-benchmark levels of COD and Zinc. We feel the additional Control Measures and BMP's implemented to address above benchmark levels of TSS will also reduce the COD and Zinc levels.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

There were no storm water discharges present during the inspection and there was no evidence of pollutants entering the drainage systems. The areas in and around the outfalls were in good condition and there are no areas at the complex where scouring can take place.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

☒ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?

05

NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA ____: Fueling Areas

1. Brief Description:

The fueling areas have containment around the tanks and piping. All hoses are stored within the containments. Containment areas are inspected monthly for any signs of leakage or other problems.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ____: Log Yard

1. Brief Description:

The log yard is where all log deliveries take place. All truck loading and unloading operations take place in the yard. Logs are sorted and laid out for scaling purposes prior to being picked up and delivered to the mills or log inventory areas.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised c necessary in this area? ☒ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

This is an area that was heavily laden with loose soil and has an abundance of heavy equipment and truck traffic.

INDUSTRIAL ACTIVITY AREA ____: Log Storage

Brief Description:

The log storage areas are where logs are inventoried for later use by the mills. These areas can either be wet or dry storage areas.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised BMPs necessary in this area? ☒ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

This is an area that was heavily laden with loose soil and has an abundance of heavy equipment traffic.

NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA ____: Equipment Wash Area

1. Brief Description:

The equipment wash area is comprised of a steam cleaning rack where all equipment is washed prior to undergoing maintenance work. The water and residues from the steam cleaning activities are captured in a self contained system and never discharged to storm water.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO3. Have any control measures failed and require replacement? ☐ YES ☒ NO4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ____: Resin and Chemical Unloading Area

1. Brief Description:

Chemical unloading is conducted on a concrete surface with a dedicated drain to capture any spillage and direct it to the process waste water system. All hose connections are conducted under a roof with a capture drain, to the process waste water system, underneath.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO3. Have any control measures failed and require replacement? ☐ YES ☒ NO4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ____: Log Merchandising

1. Brief Description:

The log merchandising area is a large area of equipment used to debark and saw logs into shorter segments and then convey them into the mills. The area generates a lot of woody debris which is cleaned up daily. The area is exposed to lubricating oil leaks which are absorbed by the woody debris. Again, the area is cleaned daily and monitored to ensure no oils migrate to storm water.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO3. Have any control measures failed and require replacement? ☐ YES ☒ NO4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 05 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS and COD exceeded at SMC001.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 02/01/2012

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We have performed rock reinforcement in the past without positive results. We extensively increased the amount of rock in order to substantially affect the reinforcement of a good base for heavy equipment traffic.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 03/01/2012

10. Date correction action completed: 08/31/2012 or expected to be completed: / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 02 of 05 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☒ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS and COD exceeded at SMC001.

5. Date problem identified: 05/01/2012

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We have raised the conveyance pump approximately three (3) feet. We shall place the pump inside an isolation container that will also promote the sediment separating activity of the settling basin to decrease TSS. We shall perform the sediment clean-out of the settling basin as this installation is performed.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 06/01/2012

10. Date correction action completed. / / or expected to be completed 11/30/2012

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 03 of 05 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☒ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, and Zinc exceeded at SMC002.

5. Date problem identified: 10/20/2010

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

In the meantime, we have placed straw bales at the inlet and made improvements to the settling basin of SMC002 to attempt to decrease the TSS values. a clean-out of sediment from the settling basin was performed and the sampling point has been moved from the inlet of the settling basin to the outlet of the settling basin, which will be a permanent change.

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 07/01/2012

10. Date correction action completed: / / or expected to be completed: 09/30/2013

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

2011, 2012, and 2013 budgets have/has monies set aside for a paving project on our site. The Corp of Engineers has been continually delaying a project year to year since 2011 for improvement to the Levee and road adjacent to SMC002, which is affecting our ability to improve (paving) the area for storm water runoff to SMC002.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 04 of 05 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☒ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS exceeded at SMC003.

5. Date problem identified: 07/01/2012

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Straw bales have been strategically placed in the storm water ditch to attempt to decrease TSS. The sampling point has been moved to a post-bale location towards the edge of the property boundary.

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 08/01/2012

10. Date correction action completed: 08/30/2012 or expected to be completed: / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 05 of 05 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☒ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS exceeded at SMC004.

5. Date problem identified: 07/01/2012

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Straw bales have been strategically placed in the storm water ditch to attempt to decrease TSS.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 08/01/2012

10. Date correction action completed: 08/01/2012 or expected to be completed:

 / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

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E. ANNUAL REPORT CERTIFICATION**1. Compliance Certification**

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☒ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative
Printed Name:

Steve Henson

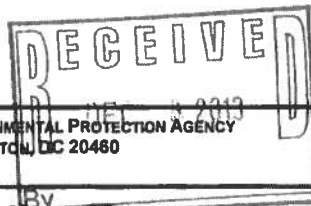
Title:

Plant Manager

Signature:

Date Signed: 11/02/2012

DEC 16 2013



NPDES Permit Tracking No.:

1DR05B6211



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: St Maries Complex

2. NPDES Permit Tracking No.: 1DR05B6211

3. Facility Physical Address:

a. Street: 2200 Railroad Ave

b. City: St Maries

c. State: ID d. Zip Code: 83861

4. Lead Inspectors Name: Ward Cooper Title: Environmental Mgr.

Additional Inspectors Name(s): Mike Fitzgerald

5. Contact Person: Ward Cooper Title: Environmental Mgr.

Phone: 208 - 245 - 7503 Ext. E-mail: ward.cooper@potlatchcorp.com

6. Inspection Date: 11/05/2013

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☒ YES ☐ NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☒ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

TSS exceeded benchmarks in locations SMC 001, SMC 002, SMC 003, SMC 004.

COD levels exceeded benchmark in location SMC 001, SMC 002, SMC 003, SMC 004.

Zinc levels exceeded benchmarks in location SMC 001, SMC 002, SMC 003, SMC 004.

During inspection we tried to identify source of TSS and believe we can improve TSS levels through implementation of additional Control Measures and BMP's.

We were unable to identify any suspect agents that influence above-benchmark levels of COD and Zinc. We feel the additional Control Measures and BMP's implemented to address above benchmark levels of TSS will also reduce the COD and Zinc levels.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

There were no storm water discharges present during the inspection and there was no evidence of pollutants entering the drainage systems. The areas in and around the outfalls were in good condition and there are no areas at the complex where scouring can take place.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection? ☒ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?

04

NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA ____: Fueling Areas

1. Brief Description:

The fueling areas have containment around the tanks and piping. All hoses are stored within the containments. Containment areas are inspected monthly for any signs of leakage or other problems.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ____: Log Yard

1. Brief Description:

The log yard is where all log deliveries take place. All truck loading and unloading operations take place in the yard. Logs are sorted and laid out for scaling purposes prior to being picked up and delivered to the mills or log inventory areas.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised c necessary in this area? ☒ YES ☐ NO

If YES to any of these three questions, provide a description of the problem. (Any necessary corrective actions should be described on the attached Corrective Action Form)

This is an area that was heavily laden with loose soil and has an abundance of heavy equipment and truck traffic.

INDUSTRIAL ACTIVITY AREA ____: Log Storage

Brief Description:

The log storage areas are where logs are inventoried for later use by the mills. These areas can either be wet or dry storage areas.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised BMPs necessary in this area? ☒ YES ☐ NO

If YES to any of these three questions, provide a description of the problem. (Any necessary corrective actions should be described on the attached Corrective Action Form)

This is an area that was heavily laden with loose soil and has an abundance of heavy equipment traffic.

NOTE: Copy this page and attach additional pages as necessary**INDUSTRIAL ACTIVITY AREA _____: Equipment Wash Area****1. Brief Description:**

The equipment wash area is comprised of a steam cleaning rack where all equipment is washed prior to undergoing maintenance work. The water and residues from the steam cleaning activities are captured in a self contained system and never discharged to storm water.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____: Resin and Chemical Unloading Area**1. Brief Description:**

Chemical unloading is conducted on a concrete surface with a dedicated drain to capture any spillage and direct it to the process waste water system. All hose connections are conducted under a roof with a capture drain, to the process waste water system, underneath.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____: Log Merchandising**1. Brief Description:**

The log merchandising area is a large area of equipment used to debark and saw logs into shorter segments and then convey them into the mills. The area generates a lot of woody debris which is cleaned up daily. The area is exposed to lubricating oil leaks which are absorbed by the woody debris. Again, the area is cleaned daily and monitored to ensure no oils migrate to storm water.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 04 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, Zinc exceeded at SMC001.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 03 / 01 / 2013

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We continue to increased the amount of rock in order to substantially affect the reinforcement of a good base for heavy equipment traffic. We also patched (asphalt) 18 holes in the Log Scaling Yard, paved (asphalt) the Sawmill Log Stacking area, paved (asphalt) the road to the Log Yard beside the Sawmill, and patched (asphalt) the Plywood roadway and parking areas.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 05 / 01 / 2013

10. Date correction action completed: 10 / 31 / 2013 or expected to be completed: / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

We have completed actions that have definitely improved the sampling values. The 2nd Quarter had values that were below benchmark values on all three (3) constituents (TSS, COD, Total Zinc). However, we are continuing to work to further improve the sampling values.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 02 of 04 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, and Zinc exceeded at SMC002.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 10/20/2010

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Working with the EPA, U.S. Army Corp of Engineers, City of St. Maries, and other Sub-Contractors we were able to complete the Levee Seepage road entering our site and the paving (asphalt) on our site. We also bought a Sweeper to assist in clean-up of new pavement. The 3rd Quarter had values that were below benchmark values on all three (3) constituents (TSS, COD, Total Zinc). However, we are continuing to work to further improve the sampling values.

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 06/01/2013

10. Date correction action completed: []/[]/[] or expected to be completed: 06/30/2014

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

Following the completion of the Levee Seepage road we paved (asphalt) the entire front entry to our facility, which included Shipping Office, Truck Scales, Guard Shack, and the NE end of Planer Mill building. As weather (snow) has come upon us we have not had to the chance to fully implement our corrective actions. We shall pursue the decrease of TSS in our water sample results in 2014.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 03 of 04 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, and Zinc exceeded at SMC03.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 07/01/2012

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We moved the sampling location to the South end of the waterway. 1st Quarter sampling results proved to be below the TSS, COD, and Zinc Benchmark guidelines.

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 02/01/2013

10. Date correction action completed. 10/01/2013 or expected to be completed: / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 04 of 04 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, and Zinc exceeded at SMC 004.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 07/01/2012

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Paved (asphalt) the entire area North of the Sampling waterway. Dug out and deepened the waterway. Placed straw bales in the waterway.

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 02/01/2013

10. Date correction action completed: 10/01/2013 or expected to be completed: _____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:

11DR05B621

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☒ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative
Printed Name:

Steve Henson

Title:

Plant Manager

Signature:

Steven Henson

Date Signed: 12/05/2013



Potlatch Land and Lumber, LLC

St. Maries Complex
2200 Railroad Avenue
St. Maries, ID 83861
Ph: 208.245.2585
FX: 208.245.7542

December 5, 2013

Certified Mail # 7012 2210 0001 5602 3895

U.S. EPA
Office of Water, Water Permits Division
Mail Code 4203M, Attn: MSGP Reports
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

RF: NPDES Permit Tracking No.: IDR05B62I

To Whom It May Concern,

Attached is the Annual Report for the above referenced MSGP. If you have any questions in regards to this report please contact Ward Cooper at (208) 245-7503.

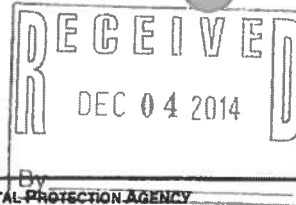
Sincerely,

Steve Henson
Plant Manager - Potlatch Land & Lumber, LLC - St. Maries Complex & LDD

attachment

cc : Ward Cooper
Environmental Manager - Potlatch Land & Lumber, LLC - St. Maries Complex & LDD

DEC 10 2014



NPDES Permit Tracking No.:

1DR05B6211



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: St Maries Complex

2. NPDES Permit Tracking No.: 1DR05B6211

3. Facility Physical Address:

a. Street: 2200 Railroad Ave

b. City: St Maries

c. State: ID d. Zip Code: 83861

4. Lead Inspectors Name: Ward Cooper Title: Environmental Mgr.

Additional Inspectors Name(s): Mike Fitzgerald

5. Contact Person: Ward Cooper Title: Environmental Mgr.

Phone: 208-245-7503 Ext. E-mail: ward.cooper@potlatchcorp.com

6. Inspection Date: 10/29/2014

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☒ YES ☐ NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

3 Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☒ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

TSS exceeded benchmarks in locations SMC 001, SMC 002, SMC 003, SMC 004.

COD levels exceeded benchmark in location SMC 001, SMC 002, SMC 003, SMC 004.

Zinc levels exceeded benchmarks in location SMC 001, SMC 002, SMC 003, SMC 004.

During inspection we tried to identify source of TSS and believe we can improve TSS levels through implementation of additional Control Measures and BMP's.

We were unable to identify any suspect agents that influence above-benchmark levels of COD and Zinc. We feel the additional Control Measures and BMP's implemented to address above benchmark levels of TSS will also reduce the COD and Zinc levels.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

There were no storm water discharges present during the inspection and there was no evidence of pollutants entering the drainage systems. The areas in and around the outfalls were in good condition and there are no areas at the complex where scouring can take place.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

☒ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?

04

NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA ____: Fueling Areas

1. Brief Description:

The fueling areas have containment around the tanks and piping. All hoses are stored within the containments. Containment areas are inspected monthly for any signs of leakage or other problems.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ____: Log Yard

1. Brief Description:

The log yard is where all log deliveries take place. All truck loading and unloading operations take place in the yard. Logs are sorted and laid out for scaling purposes prior to being picked up and delivered to the mills or log inventory areas.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

This is an area that has an abundance of heavy equipment and truck traffic.

INDUSTRIAL ACTIVITY AREA ____: Log Storage

Brief Description:

The log storage areas are where logs are inventoried for later use by the mills. These areas can either be wet or dry storage areas.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised BMPs necessary in this area? ☒ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

This is an area that was heavily laden with loose soil and has an abundance of heavy equipment traffic.

NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA ____: Equipment Wash Area

1. Brief Description:

The equipment wash area is comprised of a steam cleaning rack where all equipment is washed prior to undergoing maintenance work. The water and residues from the steam cleaning activities are captured in a self contained system and never discharged to storm water.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO
3. Have any control measures failed and require replacement? ☐ YES ☒ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ____: Resin and Chemical Unloading Area

1. Brief Description:

Chemical unloading is conducted on a concrete surface with a dedicated drain to capture any spillage and direct it to the process waste water system. All hose connections are conducted under a roof with a capture drain, to the process waste water system, underneath.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO
3. Have any control measures failed and require replacement? ☐ YES ☒ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ____: Log Merchandising

1. Brief Description:

The log merchandising area is a large area of equipment used to debark and saw logs into shorter segments and then convey them into the mills. The area generates a lot of woody debris which is cleaned up daily. The area is exposed to lubricating oil leaks which are absorbed by the woody debris. Again, the area is cleaned daily and monitored to ensure no oils migrate to storm water.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO
3. Have any control measures failed and require replacement? ☐ YES ☒ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

10R05B621

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 04 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, Zinc exceeded at SMC001.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 03 / 01 / 2013

6. How problem was identified:

- ☒ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We continue to increased the amount of rock on the Log Stacking Decks in order to substantially affect the reinforcement of a good base for heavy equipment traffic. We are also cleaning loose soil from the surrounding ditches.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 05 / 01 / 2013

10. Date correction action completed: / / or expected to be completed: 11 / 30 / 2015

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

We have completed actions that have definitely improved the sampling values. The 2nd Quarter had values that were below benchmark values on two of the three constituents (TSS, COD). We have reduced test values since 2012, however, we are continuing to work to further improve the sampling values.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 02 of 04 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, and Zinc exceeded at SMC002.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 10 / 20 / 2010

6. How problem was identified:

- ☒ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We completed the paving of the facility entrance. However, we did begin the construction of a new office in the same area, which will be completed in December 2014. We have also recently moved the sampling area. We now have two (2) settling basins prior to the sampling area. The TSS test value was well below the benchmark value in the 4th Quarter of 2014. However, the COD and Total Zinc values did not fall as far as expected.

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 06 / 01 / 2013

10. Date correction action completed: / / or expected to be completed 11 / 30 / 2015

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

As weather (snow) has come upon us we have not had to the chance to fully implement our corrective actions. We shall pursue the decrease of TSS in our water sample results in 2015.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 03 of 04 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, and Zinc exceeded at SMC03.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 07 / 01 / 2012

6. How problem was identified:

- ☒ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We moved the sampling location to the South end of the waterway. 2nd Quarter sampling results proved to be below the TSS and COD Benchmark guidelines.

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 02 / 01 / 2013

10. Date correction action completed: / / or expected to be completed: 11 / 30 / 2015

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

We are currently removing soil from the main ditch so we can sample even farther out on the sampling artery ditch.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 04 of 04 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, and Zinc exceeded at SMC 004.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 07 / 01 / 2012

6. How problem was identified:

- ☒ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Placed straw bales in the waterway. 2nd Quarter sampling results proved to be below the TSS, CO, and Total Zinc Benchmark guidelines.

8. Did/will this corrective action require modification of your SWPPP? ☒ YES ☐ NO

9. Date corrective action initiated: 02 / 01 / 2013

10. Date correction action completed: / / or expected to be completed: 11 / 30 / 2015

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action.

We are currently removing soil from the main ditch so we can sample even farther out on the sampling artery ditch.

E. ANNUAL REPORT CERTIFICATION**1. Compliance Certification**

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☒ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative
Printed Name:

Steve Henson

Title: Plant Manager

Signature:

even Henson

Date Signed: 11 / 26 / 2014



Potlatch Land and Lumber, LLC

St. Maries Complex
2200 Railroad Avenue
St. Maries, ID 83861
Ph: 208.245.2585
FX: 208.245.7542

November 26, 2014

Certified Mail # 7013 1090 0001 3567 6036

U.S. EPA
Office of Water, Water Permits Division
Mail Code 4203M, Attn: MSGP Reports
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

RF: NPDES Permit Tracking No.: IDR05B62I

To Whom It May Concern,

Attached is the Annual Report for the above referenced MSGP. If you have any questions in regards to this report please contact Ward Cooper at (208) 245-7503.

Sincerely,

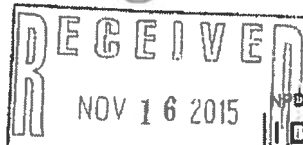
Steve Henson

Plant Manager - Potlatch Land & Lumber, LLC - St. Maries Complex & LDD

attachment

cc : Ward Cooper
Environmental Manager - Potlatch Land & Lumber, LLC - St. Maries Complex & LDD

NOV 18 2015



NPDES Permit Tracking No.:
IDR05B6211



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: St Maries Complex

2. NPDES Permit Tracking No.: IDR05B6211

3. Facility Physical Address:

a. Street: 2200 Railroad Ave

b. City: St Maries

c. State: ID d. Zip Code: 83861

4. Lead Inspectors Name: Ward Cooper

Title: Environmental Mgr.

Additional Inspectors Name(s): Wade Priddy

Log Yard Supervisor

5. Contact Person: Ward Cooper

Title: Environmental Mgr.

Phone: 208-245-7503 Ext. E-mail: ward.cooper@potlatchcorp.com

6. Inspection Date: 11/04/2015

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☒ YES ☐ NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

3 Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☒ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

TSS exceeded benchmarks in locations SMC 001, SMC 002, SMC 003, SMC 004.

COD levels exceeded benchmark in location SMC 001, SMC 002, SMC 003, SMC 004.

Zinc levels exceeded benchmarks in location SMC 001, SMC 002, SMC 003, SMC 004.

During inspection we tried to identify source of TSS and believe we can improve TSS levels through implementation of additional Control Measures and BMP's.

We were unable to identify any suspect agents that influence above-benchmark levels of COD and Zinc. We feel the additional Control Measures and BMP's implemented to address above benchmark levels of TSS will also reduce the COD and Zinc levels.

5 Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

There were no storm water discharges present during the inspection and there was no evidence of pollutants entering the drainage systems. The areas in and around the outfalls were in good condition and there are no areas at the complex where scouring can take place.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

☒ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?

03

NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA ____: Fueling Areas

1. Brief Description:

The fueling areas have containment around the tanks and piping. All hoses are stored within the containments. Containment areas are inspected monthly for any signs of leakage or other problems.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ____: Log Yard

1. Brief Description:

The log yard is where all log deliveries take place. All truck loading and unloading operations take place in the yard. Logs are sorted and laid out for scaling purposes prior to being picked up and delivered to the mills or log inventory areas.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

This is an area that has an abundance of heavy equipment and truck traffic.

INDUSTRIAL ACTIVITY AREA ____: Log Storage

Brief Description:

The log storage areas are where logs are inventoried for later use by the mills. These areas can either be wet or dry storage areas.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO

3. Have any control measures failed and require replacement? ☐ YES ☒ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

This is an area that was heavily laden with loose soil and has an abundance of heavy equipment traffic.

NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA _____ Equipment Wash Area

1. Brief Description:

The equipment wash area is comprised of a steam cleaning rack where all equipment is washed prior to undergoing maintenance work. The water and residues from the steam cleaning activities are captured in a self contained system and never discharged to storm water.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO
3. Have any control measures failed and require replacement? ☐ YES ☒ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____ Resin and Chemical Unloading Area

1. Brief Description:

Chemical unloading is conducted on a concrete surface with a dedicated drain to capture any spillage and direct it to the process waste water system. All hose connections are conducted under a roof with a capture drain, to the process waste water system, underneath.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO
3. Have any control measures failed and require replacement? ☐ YES ☒ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____ Log Merchandising

1. Brief Description:

The log merchandising area is a large area of equipment used to debark and saw logs into shorter segments and then convey them into the mills. The area generates a lot of woody debris which is cleaned up daily. The area is exposed to lubricating oil leaks which are absorbed by the woody debris. Again, the area is cleaned daily and monitored to ensure no oils migrate to storm water.

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO
3. Have any control measures failed and require replacement? ☐ YES ☒ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☒ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 03 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, Zinc exceeded at SMC001.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 03/01/2013

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We continue to increased the amount of rock on the Log Stacking Decks in order to substantially affect the reinforcement of a good base for heavy equipment traffic.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 05/01/2015

10. Date correction action completed: 11/01/2015 or expected to be completed: / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

We have completed actions that have definitely improved the sampling values. We will clean out (loose soil) the Outfall 001 settling basin in the Spring of 2016. We have reduced test values since 2012, however, we are continuing to work to further improve the sampling values.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 02 of 03 for this reporting period.

2. Is this corrective action:

☐ An update on a corrective action from a previous annual report, or

☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

☐ Unauthorized release or discharge

☐ Numeric effluent limitation exceedance

☐ Control measures inadequate to meet applicable water quality standards

☐ Control measures inadequate to meet non-numeric effluent limitations

☐ Control measures not properly operated or maintained

☐ Change in facility operations necessitated change in control measures

☒ Average benchmark value exceedance

☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, Zinc exceeded at SMC004.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 05 / 01 / 2015

6. How problem was identified:

☐ Comprehensive site inspection

☒ Quarterly visual assessment

☒ Routine facility inspection

☒ Benchmark monitoring

☐ Notification by EPA or State or local authorities

☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We placed rock in a wide area surrounding the SMC 004 area. We also placed some barriers around the area to lessen the forklift traffic disturbing the immediate area.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 05 / 01 / 2015

10. Date corrective action completed: 05 / 30 / 2015 or expected to be completed: / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

We have completed actions that have definitely improved the sampling values. We will clean out (loose soil) the SMC 004 settling basin in the Spring of 2016. We have reduced test values since 2012, however, we are continuing to work to further improve the sampling values.

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 03 of 03 for this reporting period.

2. Is this corrective action:

- ☒ An update on a corrective action from a previous annual report; or
☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
☐ Numeric effluent limitation exceedance
☐ Control measures inadequate to meet applicable water quality standards
☐ Control measures inadequate to meet non-numeric effluent limitations
☐ Control measures not properly operated or maintained
☐ Change in facility operations necessitated change in control measures
☒ Average benchmark value exceedance
☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark levels of TSS, COD, Zinc exceeded at SMC001, SMC 002, SMC 003 and SMC 004.

Our facility is built on land that has an extremely loose soil base. Heavy equipment operations easily disturbs the soil and the loose soil is carried to the Storm Water ditches during rainfall events.

5. Date problem identified: 03 / 01 / 2015

6. How problem was identified:

- ☐ Comprehensive site inspection
☒ Quarterly visual assessment
☒ Routine facility inspection
☒ Benchmark monitoring
☐ Notification by EPA or State or local authorities
☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

We completed paving projects at the Log Yard, Sawmill, Planer and Facility entry areas. This should have a positive effect for all four (4) Outfalls in regards to TSS, which we believe will also effect COD and Total Zinc.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 03 / 01 / 2015

10. Date correction action completed: 04 / 21 / 2015 or expected to be completed: / /

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:

1DR05B621

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☒ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative
Printed Name:

Steve Henson

Title: Plant Manager

Signature:

Date Signed: 11/11/2015

**ATTACHMENT E – Stormwater Best Management Practices Proposed
December 5, 2016**



Potlatch Land and Lumber, LLC

St. Maries Complex
2200 Railroad Avenue
St. Maries, ID 83861
Ph: 208.245.2585
FX: 208.245.7542

December 5, 2016
Project No. 1013.05.02

Confidential
Attorney-Client Communication/Attorney Work Product

Margaret McCauley
U.S. Environmental Protection Agency, Region 10
Office of Water & Watersheds
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Re: BMP Plan

Dear Ms. McCauley:

In the fall of 2015 Potlatch Land and Lumber ("Potlatch") timely submitted an NOI (Notice of Intent) to renew coverage under 2015 MSGP for stormwater discharges from the St. Maries Mill Complex (the "site") in St. Maries, Idaho. During the agency review process in the Spring of 2016 the USEPA received comments from the USFWS requesting that USEPA hold the NOI due to periodic benchmark guideline exceedances for total zinc in stormwater discharges from the site. USFWS expressed concern that such discharges could adversely affect bull trout. The USEPA returned the USFWS comments to Potlatch with a requirement for mitigation. Upon further discussion the USEPA agreed that Potlatch could continue operating under the 2008 MSGP permit until mitigation efforts could be implemented or until USEPA issued an individual stormwater permit for the site. Changes have been proposed to stormwater best management practices (BMPs) to be implemented at the site. Narrative descriptions of proposed stormwater BMPs for Basins 001, 002, 003, and 004 are presented below.

SITE DESCRIPTION

The site discharges stormwater associated with forest products industrial activities consistent with a National Pollutant Discharge Elimination System Stormwater Discharge Multi-Sector General Permit (the Permit) issued to Potlatch by the USEPA.

Recent effluent monitoring conducted in compliance with the Permit has shown that discharge pollutant concentrations have periodically exceeded the effluent benchmarks. Potlatch requested that Maul Foster & Alongi, Inc. (MFA), our engineering consultant, provide recommendations for reducing these pollutant concentrations in effluent discharging from Basins 001, 002, 003, and 004. MFA visited the site on September 15, 2016, to observe the industrial activities and existing stormwater pollution-control measures. The attached figure outlines each basin mentioned, shows the current stormwater sampling locations, and indicates the location of the Outfalls monitoring locations. The outfall for Basin 001 is in the northwest corner of the property where stormwater is discharged to the Saint Joe River. The outfall for stormwater from Basins 002 through 004 is located to the east of the Saint Maries complex and discharged to a perimeter ditch which leaves the property draining to the east.

Basins 001, 002, 003, and 004 are subject to vehicle and equipment traffic and are used for storage, transport, and processing of logs, wood chips, and other wood products. Some of the roads are paved, but most of the site consists of compacted gravel and log deck rock surfaces. Truck traffic and galvanized metals can contribute to zinc concentrations, and the decomposition of lignin and tannins from logs and bark can contribute to chemical oxygen demand (COD) levels in stormwater. Wood-products particulates, gravel particles, and vehicle traffic can also contribute to levels of total suspended solids (TSS) in stormwater.

Since the amount of zinc in particulate form, as opposed to dissolved form, is unknown at this time, Potlatch will conduct additional internal monitoring of water quality to determine the form of zinc in the runoff. This information will help guide the work to lower zinc levels in the discharges. All of the above-noted basins discharge stormwater directly or indirectly to the St. Joe River (a tributary of Coeur d'Alene Lake). Following is a summary of BMPs that would reduce zinc and other permit benchmark concentrations in the effluent discharged from Basins 001, 002, 003, and 004.

PROPOSED STORMWATER TREATMENT BMP INSTALLATION

Basin 001

The northernmost portion of the site consists of plywood fuel storage, log yard and merchandising, resin and chemical offloading, lumber and log storage, and rolling-stock maintenance. Runoff from the log yards and much of the area is collected in ditches that flow by gravity to the north pond. Runoff from this basin is pumped from the pond to the St. Joe River at Outfall 1.

In order to retain solids in ditches and lower suspended zinc and TSS, rock check dams will be constructed in the two ditches leading to the pond. Potlatch Corporation will modify bubbler pump assemblies near the outfall pond to shift the turbidity generating pumps farther away from the basin outfall. In addition, Potlatch will modify the pond to add compartments at each inlet to encourage sedimentation before the water reaches the intake. A modified suction including a weir and screen surrounding the intake will be installed to allow additional sedimentation to occur. Modifying the structure around the existing suction line (vertical line going down from container box) will reduce the amount of solids sucked into the line.

Basin 002

The drainage basin located at the southeast corner of the complex is one of the smaller drainage basins on the facility, and use of the basin consists of log delivery, product shipping, and employee traffic. Runoff in this basin, which includes runoff from a neighboring property, gravity-flows to the perimeter ditch. Stormwater is collected at a low point and routed through two small ponds within the basin and then into the perimeter ditch. The perimeter ditch conveys stormwater to the east, off of the site, to a city pump station where the water is discharged by the City into the St. Joe River.

The upper pond will be modified to include an upturned elbow or riser that will raise the water level in the pond, promote sedimentation, and allow cleaner water to be discharged from the top of the pond. A weir around the elbow's inlet would also hold back scum and floatables. The lower pond will be enlarged by removing several trees and excavating to the west to allow more residence time and settling. A rock check dam will be added to the second pond to reduce water flow velocities and encourage settling. The outlet will use the same system of an upturned elbow or riser to raise the water level in the pond and allow the discharge of cleaner water from the surface of the pond. A weir constructed at the elbow's inlet would also hold back scum and floatables.

Basin 003

Basin 003 is located just west of Basin 002; products are stored and shipping activities are conducted in this basin. Runoff from this basin sheet-flows into a north-south ditch all along its length. The ditch discharges toward the south side of the complex in a culvert and is described as Basin 003. A rock check dam and some straw bales were recently added to the ditch to help control solids.

The berms to each side of the ditch will be modified to force surface runoff to enter the north end of the ditch so that BMPs installed in this stretch of ditch will treat all of the contributing runoff. A rock check dam will be added near the midpoint of the ditch upstream from the existing dam to provide additional filtration and sedimentation. Basin 003 is discharged into a perimeter ditch that runs along the southern end of the site and is conveyed to the east, and off the property.

Basin 004

Basin 004 is located just north and west of Basin 003; products are stored and shipping activities are conducted in this basin. This basin includes an internal collection ditch, which is connected to the south perimeter ditch by a culvert that discharges flows from Basin 004. The internal ditch is relatively shallow, which may limit the types of in-ditch BMPs that can be applied.

A rock check dam will be added to the section of ditch above an existing check dam if the topography allows. If culvert inverts will support deepening the ditch, then additional BMPs will be installed internal to Basin 004. Basin 004 is discharged into a perimeter ditch that runs along the southern end of the site and is conveyed to the east, and off the property.

Combining Basins 003 and 004

Additional BMPs for drainage basins 003 and 004 may be better applied in the perimeter ditch rather than internally because of the limited treatment capabilities of the shallow ditches in each basin. The perimeter ditch is significantly deeper and could be used to treat the runoff. Construction of a check dam downstream of the culvert from Basin 003 would trap sediment. Construction of gabion filter baskets in the perimeter ditch downstream of all other BMPs will

Margaret McCauley

Project No. 1013.05.02

December 5, 2016

Confidential

Page 4

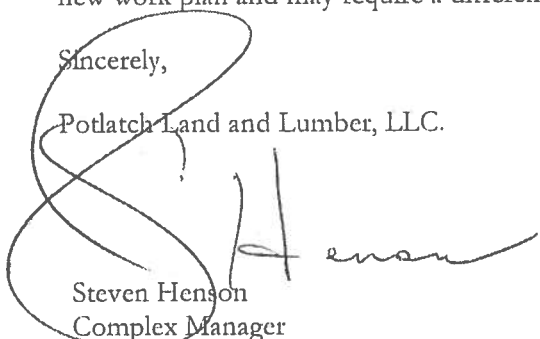
Attorney-Client Communication/Attorney Work Product

reduce suspended zinc and TSS concentrations. The gabion basket would be filled with several types of filter media, including reactive media. Construction of a weir in the lower section of the perimeter ditch would control water levels upstream and would create a longer treatment flow path that includes additional BMPs to lower TSS and zinc concentrations prior to discharge. The existing monitoring points for Basins 003 and 004 can then be consolidated to a point at the weir discharge where the combined stormwater outfall will reflect the additional BMPs implemented to lower TSS and zinc concentrations.

The above-mentioned BMPs for all Basins are intended to reduce TSS and zinc concentrations in stormwater at the site. Potlatch will begin implementation of the BMPs at the site in 2017, and MFA will continue working with Potlatch to develop long-term strategies that will ensure compliance with permit benchmarks. As these long-term strategies are formulated, it is possible that a more effective option may be discovered and Potlatch may decide to modify the treatment BMPs proposed. Potlatch will notify the USEPA if they decide to modify the approach described herein by next spring. A change to the BMPs prescribed would entail a new work plan and may require a different timetable.

Sincerely,

Potlatch Land and Lumber, LLC.



Steven Henson
Complex Manager

Attachments:

Figure

BASIN AREAS

BASIN NUMBER	BASIN AREA (ACRES)	BASIN AREA (SF)
001	84.05	3,661,217
002	7.09	309,052
003	6.52	284,187
004	7.23	314,822
ALL BASINS	104.89	4,569,278

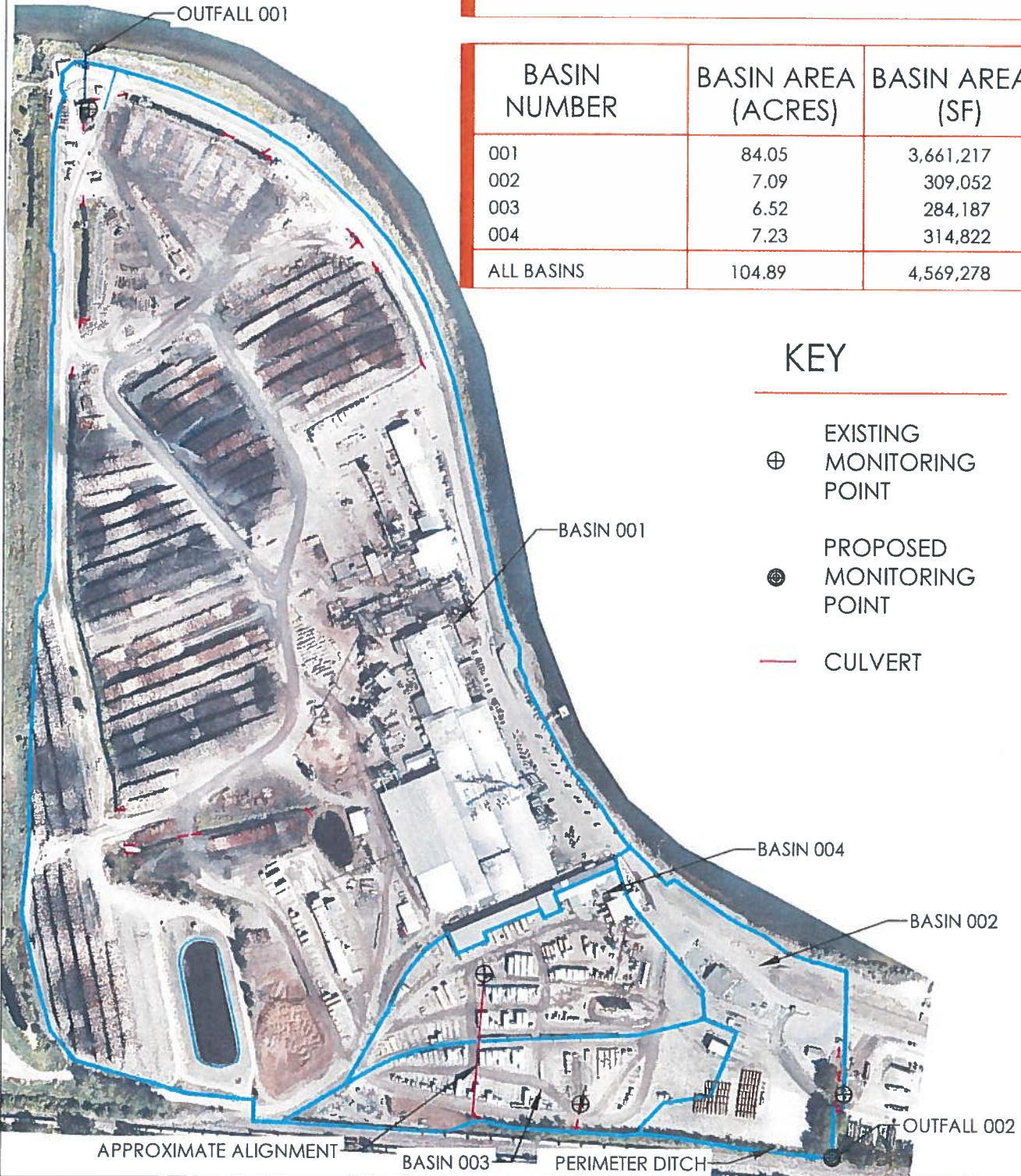
KEY

- ⊕ EXISTING MONITORING POINT
- ⊙ PROPOSED MONITORING POINT
- CULVERT

Filepath: G:\1013 05 Pollatch Corporation\EXHIBIT\OVERVIEW.dwg

Printed by: Brooke Harmon

Date: 10/07/2016



MAUL FOSTER ALONGI
360.694.2691 [phone] | www.maulfooster.com

0 400' 800'



NOTE, BAR IS ONE INCH ON ORIGINAL DRAWING. IF NOT ONE INCH ON THIS SHEET, ADJUST SCALE ACCORDINGLY.



Figure 1
ALL BASINS

POTLATCH CORPORATION
ST. MARIES, ID

ATTACHMENT F – Safety Data Sheet for NALCO® 7469 Defoamer

